

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

TYLER LE,

Defendant.

No. 1:19-cr-57 (LO)

STATEMENT OF FACTS

The United States and the defendant, Tyler Le (the "Defendant"), agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. Beginning in or about 2015, and continuing thereafter up to and including September 2019, in Fairfax County, Virginia, within the Eastern District of Virginia and elsewhere, the Defendant did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with Tony Le, Peter Le, Kyu Wa Hong, Sang Thanh Huynh, Tasneef Ahmed Chowdhury, David Thai Hoang Nguyen, Young Yoo, Sascha Amadeus Carlisle, and others, both known and unknown, to unlawfully, knowingly, and intentionally manufacture, distribute, and possess with the intent to manufacture and distribute 1,000 or more marijuana plants and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

2. In and around 2015, the Defendant joined the Reccless Tigers gang. Prior to joining the Reccless Tigers, the Defendant purchased controlled substances from members of the

Reccless Tigers. Over time, the Defendant built up a drug debt to members of the Reccless Tigers. When the Defendant failed to pay off his debt, members of the gang beat him up.

3. At some point after being beat up, the Defendant became a member of the Reccless Tigers. While in the gang, the Defendant took part in “jumping in” new members. During a jump in, the prospective member stands in the middle of a circle and gang members then beat the prospective member for approximately 30 seconds. The Defendant also took part in acts of gang intimidation, including at least one assault.

4. On or about November 1, 2016, the Defendant took part in firebombing a residence located in Stafford, Virginia. During this event, members of the Reccless Tigers threw two Molotov cocktails at the residence, which was then occupied by three individuals. One of the Molotov cocktails was thrown through a window of the residence, which caused a fire. The second Molotov cocktail was recovered from the front yard.

5. During the conspiracy, the Reccless Tigers maintained a marijuana grow operation in California. Peter Le and others referred to the marijuana grow operation as the “farm.” The Reccless Tigers had drivers, including the Defendant, Sascha Amadeus Carlisle, and others travel to the farm to pick up marijuana and drive it to Orange County, California. From there, the marijuana was sent to the Eastern District of Virginia, where members of the Reccless Tigers distributed the marijuana in public schools and other locations.

6. The Defendant deposited cash drug proceeds into bank accounts for Peter Le and other members of the Reccless Tigers. The Defendant also paid at least one individual to purchase a vehicle on his behalf. The Defendant agreed to make the car payments and then used the car for gang business, including the distribution of controlled substances.

7. During the conspiracy, the Reccless Tigers used the Airbnb online marketplace to rent locations. The Defendant was one of the individuals tasked with renting locations on

Airbnb. At these locations, the Reccless Tigers held parties where they distributed marijuana and other controlled substances. Further, members of the Reccless Tigers also stayed at these locations and stored controlled substances.

8. On or about January 19, 2018, in San Bernardino, California, the Defendant was living at and providing security for a marijuana dispensary owned by Tony Le. At that time, the dispensary did not have a valid license to operate in California. On that day, law enforcement arrested the Defendant and another individual. The Defendant informed law enforcement that two firearms — a Remington 12 gauge shotgun and a .380 caliber handgun — were located in a hole in the ceiling. During the search, law enforcement seized the firearms identified by the Defendant, as well as ammunition, marijuana, marijuana edibles, and marijuana oil and wax.

9. During the course of this conspiracy, the Defendant was personally involved in the manufacture and distribution of, or it was reasonably foreseeable to the Defendant that his co-conspirators manufactured and distributed in furtherance of the conspiracy, at least 1,000 kilograms but less than 3,000 kilograms of converted drug weight (Level 30).

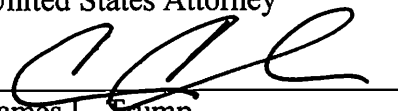
10. The acts taken by the Defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

11. The foregoing statement of facts does not describe all of the Defendant's conduct relating to the offense charged in this case nor does it identify all of the persons with whom the Defendant may have engaged in illegal activities.

Respectfully submitted,


G. Zachary Terwilliger
United States Attorney

By:


James L. Frump
Carina A. Cuellar
Assistant United States Attorneys


Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the Defendant, Tyler Le, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: ~~1/6/20~~ 1/6/2020


Tyler Le
Defendant

Defense Counsel Signature: I am counsel for the Defendant in this case. I have carefully reviewed the above statement of facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 1/6/2020


Dwight Crawley, Esq.
Counsel for the Defendant